

August 31, 2001

Mr. Michael Ahonen
HomeCrest Corporation
P. O. Box 595
Goshen, IN 46527

Re: 039-14143
Significant Permit Modification to:
Part 70 permit No.: T039-6029-00014

Dear Mr. Ahonen:

HomeCrest Corporation was issued Part 70 operating permit T039-6029-00014 on December 22, 1998 for wood furniture manufacturing operation. An application to modify the source was received on February 23, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) automated stain line, identified as EU27, with a maximum capacity of coating 2000 units per hour utilizing a high volume low pressure spray application, using dry filters for particulate matter control, and exhausting to stacks S41 and S42;
- (b) Two (2) automated varnish lines, identified as EU28 and EU29, each with a maximum capacity of coating 2000 units per hour utilizing an airless spray application, using wet scrubbers for particulate matter control, and exhausting to stacks S43 - S47 and S48 - S52, respectively; and
- (c) Millwork Woodworking equipment to replace existing woodworking operations, equipped with three (3) baghouses identified as EU15, EU16 and EU26 for particulate control, and exhausting to stacks S30, S31 and S40, respectively.

The source is also adding the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) natural gas fired boiler, identified as EU30, rated at 3.0 MMBtu per hour and exhausting through one (1) stack identified as S53.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Scott Pan at (973) 575-2555, ext. 3248, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SP/EVP

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**HomeCrest Corporation
1002 Eisenhower Drive North
Goshen, Indiana 46526**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6029-00014	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 22, 1998 Expiration Date: December 22, 2003
First Significant Permit Modification No.: SPM 039-14143-00014	
Issued by: Original Signed by Pau Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 31, 2001

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PART 70 PERMIT CERTIFICATION FORM

EMERGENCY/DEVIATION OCCURRENCE REPORTING FORM

SEMI-ANNUAL REPORT

QUARTERLY COMPLIANCE MONITORING REPORT FORM

QUARTERLY REPORT FORMS

A. SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a wood furniture manufacturing plant.

Responsible Official: Doug Conley
Source Address: 1002 Eisenhower Drive North, Goshen, IN 46526
Mailing Address: P.O. Box 595, Goshen, IN 46527
SIC Code: 2434
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas or wood fired boiler EU 1, with a maximum rating of 17 MMBtu (million British thermal units) per hour. Emissions shall be controlled by a cyclone, then exhausted at Stack ID #S1;
- (b) Millwork Woodworking equipment equipped with eleven (11) baghouses identified as EU15 through EU24, and EU26 for particulate control, and exhausting to stacks S30 through S40, respectively;
- (c) One (1) solid waste natural gas fired incinerator EU 2, with a maximum rating of 250 pounds per hour. Emissions shall be exhausted at Stack ID #S2;
- (d) Thirteen (13) Spray booths EU 3 - EU 12, EU 27, EU 28 and EU 29, consisting of the following:
 - (1) One (1) custom research and development paint booth EU 3, with a maximum rating of 3 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stack ID #S3;
 - (2) One (1) hanging line toner booth EU 4, with a maximum rating of 600 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S4 - S7;
 - (3) One (1) hanging line sealer booth EU 5, with a maximum rating of 600 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S8 - S9;
 - (4) One (1) hanging line topcoat booth EU 6, with a maximum rating of 600 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S10 - S11;

- (5) One (1) flat line toner booth EU 7, with a maximum rating of 960 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S12 - S15;
- (6) One (1) flat line sealer booth EU 8, with a maximum rating of 960 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S16 - S17;
- (7) One (1) flat line topcoat booth EU 9, with a maximum rating of 960 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S18 - S20;
- (8) One (1) flat line repair booth EU 10, with a maximum rating of 180 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stack ID #S21;
- (9) One (1) parts booth EU 11, with a maximum rating of 180 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S22-S24;
- (10) One (1) hanging line repair booth EU 12, with a maximum rating of 180 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stack ID #S25;
- (11) One (1) automated stain line, identified as EU 27 with a maximum capacity of coating 2000 units per hour utilizing a high volume low pressure spray application, using dry filters for particulate matter control, and exhausting to stacks S 41 and S 42;
- (12) Two (2) automated varnish lines, identified as EU 28 and EU 29, each with a maximum capacity of coating 2000 units per hour utilizing an airless spray application, using wet scrubbers for particulate matter control, and exhausting to stacks S 43 - S 47 and S 48 - S 52, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) natural gas fired boiler, identified as EU30, rated at 3.0 MMBtu per hour and exhausting through one (1) stack identified as S53.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; woodworking operations and Dust collection Emission Unit number 25.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B. GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield".

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, and 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance or modification; or for
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term and condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Office of Air Management, Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practical. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit under 326 IAC 2-7-9(a) shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e), and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1) and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited, under Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

C. SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will continue to comply with such requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test[326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3) [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. This annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. This emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][326 IAC 2-7-6(2)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (6) The date, place, and time of sampling or measurements;
 - (7) The dates analyses were performed;
 - (8) The company or entity performing the analyses;
 - (9) The analytic techniques or methods used;
 - (10) The results of such analyses; and
 - (11) The operating conditions existing at the time of sampling or measurement.

Support information shall include, where applicable:

- (c) Copies of all reports required by this permit;
 - (1) All original strip chart recordings for continuous monitoring instrumentation;
 - (2) All calibration and maintenance records;
 - (3) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the dates(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) one natural gas or wood fired boiler EU 1, with a maximum rating of 17 MMBtu per hour.
Emissions shall be controlled by cyclone, then exhausted at Stack/Vent ID #S1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.

Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the 17 MMBtu per hour natural gas or wood fired boiler shall be limited to 0.8 pounds per MMBtu.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM10 limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the 17 MMBtu per hour boiler cyclone stack exhaust shall be performed during normal daylight operations when wood is combusted in the boiler. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the 17 MMBtu per hour boiler cyclone stack exhaust whenever wood is burned.

Section D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Millwork Woodworking equipment equipped with eleven (11) baghouses identified as EU15 through EU24, and EU26 for particulate control, and exhausting to stacks S30 through S40, respectively. (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5. Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The Permittee shall be in compliance with the requirements by controlling woodworking particulate emissions with baghouses.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 26.8 pounds per hour when operating at a process weight rate of 33,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM10 limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the woodworking machinery is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse stacks exhaust shall be performed during normal daylight operations when vented to the outside atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.5 and D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stacks exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) solid waste natural gas fired incinerator EU 2, with a maximum rating of 250 pounds per hour and exhausted at Stack/Vent ID #S2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Solid Waste Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), this solid waste natural gas incinerator, rated at 250 pounds per hour shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity limitations).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazardous.
- (i) Not emit particulate matter (PM) in excess of 0.3 pounds per 1000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Visible Emissions Notations

- (a) Daily visible emission notations of the incinerator stack exhaust shall be performed during normal daylight operations whenever the incinerator is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

To document compliance with Condition D.3.3 the Permittee shall maintain records of daily visible emission notations of the incinerator stack exhaust.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Thirteen (13) surface coating booths, identified as units EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, EU 11, EU 12, EU27, EU28 and EU29, with dry filters for control. Unit EU-3 exhausts to Stack ID# S3; Unit EU 4 exhausts to Stacks ID# S4 - S7; Unit EU 5 exhausts to Stacks ID# S8 and S9; Unit EU 6 exhausts to Stacks ID# S10 and S11; Unit EU 7 exhausts to Stacks ID# S12 - S15; Unit EU 8 exhausts to Stacks ID# S16 and S17; Unit EU 9 exhausts to Stacks ID# S18-S20; Unit EU 10 exhausts to Stack ID# 21; Unit EU 11 exhausts to Stacks ID# S22 - S24; Unit EU 12 exhausts to Stack ID# S25; Unit EU 27 exhausts to Stacks ID# S41 - S42; Unit EU 28 exhausts to Stacks ID# S43 - S47; Unit EU 29 exhausts to Stacks ID# S48 - S52.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5. The Permittee shall be in compliance with the requirements by controlling the spray booths overspray with filters.
- (b) The entire source shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limitation includes equipment listed in sections D.3 and D.4.
- (c) Compliance with limits in D.4.1(a) and D.4.1(b) make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM from each of the thirteen (13) surface coating booths (EU 3 through EU 12, EU 27, EU 28 and EU 29) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.4.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average VHAP content across all coatings of 1.0 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.
 - (C) Use a control device to limit emissions.

- (3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.4.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line Cleaning.
- (i) Gun Cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.4.7 Testing Requirements [326 IAC 2-7-6(1), (6)] [40 CFR 63, Subpart JJ]

Pursuant to 40 CFR 63, subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, subpart JJ and 326 IAC 3-6.

D.4.8 Volatile Organic Compounds (VOC)

- (a) Compliance with VOC content limitations contained in Condition D.4.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), using formulation data supplied by the coating manufacturer. The OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedure specified in 326 IAC 8-1-4.
- (b) Compliance with Condition D.4.1(b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.9 Particulate Matter (PM)

The dry filters and wet scrubbers for PM over spray control shall be in operation at all times when the thirteen (13) surface coating booths are in operation.

D.4.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.11 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.4.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition D.4.1(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be

taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1(b).

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.4.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Conditions D.4.9 and D.4.10, the Permittee shall maintain a log of weekly over spray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Reporting Requirements

-
- (a) An Initial Compliance Report to document compliance with Condition D.4.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days after the start up of the proposed units (EU27, EU28 and EU29). The initial compliance report must include data from the entire month that the compliance date falls.
 - (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.4.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.
 - (c) The semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
 - (d) A quarterly summary of the information to document compliance with Condition D.4.1(a) and D.4.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (e) The reports required in (a), (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.5

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Insignificant Activity

One (1) natural gas-fired boiler, identified as EU30, with a heat input capacity of 3.0 million Btu per hour (MMBtu), and exhausting to stack S53.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.5.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from one (1) natural gas-fired boiler (ID No. EU30), shall not exceed 0.6 pounds per million Btu heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: HomeCrest Corporation
Source Address: 1002 Eisenhower Drive North, Goshen, Indiana 46526
Mailing Address: P.O. Box 595, Goshen, IN 46527
Part 70 Permit No.: T039-6029-00014

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: HomeCrest Corporation
Source Address: 1002 Eisenhower Drive North, Goshen, Indiana 46526
Mailing Address: P.O. Box 595, Goshen, IN 46527
Part 70 Permit No.: T039-6029-00014

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: HomeCrest Corporation
Source Address: 1002 Eisenhower Drive North, Goshen, IN 46526
Mailing Address: P.O. Box 595, Goshen, IN 46527
Part 70 Permit No.: T039-6029-00014
Facility: Surface Coating
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinners - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinners (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: HomeCrest Corporation
Source Address: 1002 Eisenhower Drive North, Goshen, IN 46526
Mailing Address: P.O. Box 595, Goshen, IN 46527
Part 70 Permit No.: T039-6029-00014

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Permit Modification Quarterly Report

Source Name: HomeCrest Corporation
Source Address: 1002 Eisenhower Drive North, Goshen, Indiana 46526
Mailing Address: P.O. Box 595, Goshen, Indiana 46527
Permit Modification No.: 039-14143-00014
Facility: Thirteen (13) surface coating booths (EU3 - EU12, EU27 - EU29)
Parameter: Volatile Organic Compounds (VOC)
Limit: less than 248 tons per twelve consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC This Month	VOC Previous 11 Months	VOC 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	HomeCrest Corporation
Source Location:	1002 Eisenhower Drive North, Goshen, Indiana 46527
County:	Elkhart
Construction Permit No.:	SPM 039-14143-00014
SIC Code:	2434
Permit Reviewer:	Linda Quigley/EVP

On May 2, 2001, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that HomeCrest Corporation had applied for a Significant Permit Modification to a Part 70 source to incorporate Minor Source Modification No. 039-13961-00014, issued on April 24, 2001, into the Part 70 permit and to re-designate the source as a PSD minor. The notice also stated that OAQ proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed permit modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 24, 2001 and May 31, 2001, HomeCrest Corporation submitted comments on the proposed significant permit modification. The summary of the comments and corresponding responses is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment #1

Dust collection Emission Unit numbers 17-24 are not listed in the draft permit. These are currently permitted emission units that are not being affected by this change but need to remain in the new permit.

Response to Comment #1

Dust collection Emission Unit numbers 17-24 were inadvertently omitted when processing the minor source modification and the significant permit revision. This does not change any permit conditions, only descriptive information. Section A.2 and the facility description of Section D.2 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas or wood fired boiler EU 1, with a maximum rating of 17 MMBtu (million British thermal units) per hour. Emissions shall be controlled by a cyclone, then exhausted at Stack ID #S1;
- (b) Millwork Woodworking equipment equipped with ~~three (3)~~ **eleven (11)** baghouses identified as EU15, ~~EU16 through EU24~~, and EU26 for particulate control, and exhausting to stacks S30, ~~S31 and through S40~~, respectively;

Section D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Millwork Woodworking equipment equipped with ~~three (3)~~ **eleven (11)** baghouses identified as EU15, ~~EU16 through EU24~~, and EU26 for particulate control, and exhausting to stacks S30, ~~S31 and through S40~~, respectively.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Comment #2

The reporting requirements in the permit do not allow adequate time for us to do all of the calculations and verify that the numbers reported are accurate. We would request that we have more than 30 days to report this information after the end of the quarter. (Sections D.1.7, D.2.10, D.3.7, D.4.13, D.5.4)

Response to Comment #2

IDEM, OAQ believes that 30 days after the end of each quarter is sufficient time to prepare quarterly reports. No change has been made as a result of this comment.

Comment #3

Section D.4.7(b) specifies that stack testing be done on the dry and wet scrubbers in order to verify their control efficiencies. This requirement actually adds restrictions to existing equipment that we are not modifying and puts large additional expenses to obtain data and information that has no real environmental benefit. We ask that this requirement to verify control efficiencies be waived.

Response to Comment #3

The OAQ has decided that, as long as the Permittee performs daily and monthly inspections on the filters for the spray booths as well as conducts weekly overspray observation and confirms that filters are operating properly, it is not necessary to verify the control efficiencies of filters through stack testing. Therefore, Condition D.4.7(b) has been removed, as follows:

D.4.7 Testing Requirements [326 IAC 2-7-6(1), (6)] [40 CFR 63, Subpart JJ]

~~(a)~~ Pursuant to 40 CFR 63, subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, subpart JJ and 326 IAC 3-6.

~~(b)~~ During the period between 18 and 24 months after issuance of this permit, in order to verify the dry filters and wet scrubbers control efficiencies, the Permittee shall perform PM and PM-10 testing on dry filters for one (1) of the eleven (11) surface coating booths controlled by dry filters for one (1) of the two (2) surface coating booths controlled by wet scrubber utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

Comment #4

Sections in D.4.12(c)(1, 2 and 3) are not needed to show compliance with D.4.1(b) and should be eliminated. Specifically the statement "Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents:" in 1 and the entire sentence in 2 and 3. Sections (4) and (5) are adequate to show compliance with D.4.1(b). This additional record keeping is excessive, not required, and will not give any additional information that is necessary to show compliance with D.4.1(b).

Response to Comment #4

The requirement to maintain the solvent usage records is necessary to prove that the source is not subject to 326 IAC 2-2 (PSD), because emissions are below 250 tons per year. OAQ agrees however that it is not necessary to differentiate between those added to coatings and those used as cleanup solvents. The logs of dates of use is needed to verify that the source has not exceeded any permit threshold in any given 12 consecutive month period. The following changes have been made to Condition D.4.12(c) (now re-numbered as D.4.11(c)):

D.4.121 Record Keeping Requirements

- (c) To document compliance with Condition D.4.1(b), the Permittee shall maintain records in accordance with (1) through ~~(5)~~(4) below. Records maintained for (1) through ~~(5)~~(4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1(b).
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) A log of the dates of use;
 - ~~(3) The cleanup solvent usage for each month;~~
 - ~~(4)~~(3) The total VOC usage for each month; and
 - ~~(5)~~(4) The weight of VOCs emitted for each compliance period.

Comment #5

Throughout the permit, PM emissions record keeping and reporting is proposed to verify that the source wide PM emissions stay under the PSD major source threshold of 250 tons per year. Based on the sieve analysis conducted by HomeCrest on the sawdust generated at the source and the amount of sawdust collected, the source can meet the 250 tons per year PSD minor threshold without utilizing the baghouse as PM control. Therefore, Home Crest requests that these record keeping and reporting be removed. Also, the calculations in the TSD should be revised accordingly.

Response to Comment #5

The sieve analysis was conducted on the material collected in the baghouse. It does not measure what was vented from the stack. If the source would like to prove that the baghouses are not necessary for the woodworking operations to stay in compliance with the PM limit then a performance test must be conducted. Therefore, the emission calculations will not be revised. However, OAQ recognizes that record keeping and reporting of particulate matter emissions are not practical for a source like HomeCrest that is not required to monitor particulate matter emissions by CEMs. The PTE PM at the source shall be limited to less than 250 tons per year by controlling PM emissions from woodworking operations with baghouses and surface coating operations with dry filters and wet scrubbers. Compliance monitoring requirements on the baghouses, dry filters and wet scrubbers were established to make sure the proper operation of the PM control devices. OAQ has agreed to removed all the PM and PM10 emissions record keeping and reporting requirements in the permit. This includes the revisions of conditions in Sections D.1 through D.5 and the removal of PM and PM10 reporting forms. The revisions to Sections D.1 through D.5 are described as follows:

Section D.1

Conditions D.1.6(b) and D.1.7 have been removed, as follows:

D.1.6 Record Keeping Requirements

- (a) ~~—To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the 17 MMBtu per hour boiler cyclone stack exhaust whenever wood is burned.~~
- (b) ~~—To document compliance with Condition D.1.1, the Permittee shall maintain monthly records of the amount of wood burned in the boiler and calculate emissions using AP-42 emission factors or other emission factors approved by IDEM, OAQ.~~

D.1.7 Reporting Requirements

~~A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

Section D.2

Conditions D.2.1 and D.2.9 have been revised and Condition D.2.10 has been removed, as follows:

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5. Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. **The Permittee shall be in compliance with the requirements by controlling woodworking particulate emissions with baghouses.**

D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.5 and D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stacks exhaust.

- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

~~(c) To document compliance with Condition D.2.1, the Permittee shall maintain records of PM and PM10 emissions. To calculate the amount of PM collected in the baghouses the following equation shall be used (note: PM10 is assumed to be equal to PM):~~

~~Amount collected lb/month * actual operating hours per month * (1 - control efficiency) =
amount of PM and PM10 emitted~~

- (dc) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

~~A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Section D.3

Conditions D.3.1, D.3.4, D.3.6(b) and D.3.7 have been removed and Conditions in Section D.3 have been revised accordingly as follows:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- ~~(a) The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.~~
- ~~(b) The entire source shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limitation includes equipment listed in sections D.3 and D.4.~~
- ~~(c) Compliance with limits in D.3.1(a) and D.3.1(b) shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.~~

D.3.21 Solid Waste Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), this solid waste natural gas incinerator, rated at 250 pounds per hour shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity limitations).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable

- pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazardous.
- (i) Not emit particulate matter (PM) in excess of 0.3 pounds per 1000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

D.3.32 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

~~D.3.4 Testing Requirements [326 IAC 2-7-6(1), (6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM10 limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.53 Visible Emissions Notations

- (a) Daily visible emission notations of the incinerator stack exhaust shall be performed during normal daylight operations whenever the incinerator is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.64 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.3.53 the Permittee shall maintain records of daily visible emission notations of the incinerator stack exhaust.~~
- ~~(b) To document compliance with Condition D.3.1(a) and D.3.1(b), the Permittee shall maintain records of PM, PM10 and VOC emissions.~~

~~D.3.7 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Section D.4

Conditions D.4.9 and D.4.12 (b) have been removed and Conditions D.4.1 and D.4.10 through D.4.13 have been revised accordingly as follows:

D.4.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5. **The Permittee shall be in compliance with the requirements by controlling the spray booths overspray with filters.**
- (b) The entire source shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limitation includes equipment listed in sections D.3 and D.4.
- (c) Compliance with limits in D.4.1(a) and D.4.1(b) make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D.4.9 Particulate Matter (PM)]~~

~~Compliance with Condition D.4.1(a) shall be demonstrated within 30 days of the end of each month based on the material usage and solid content of the material, the transfer efficiency of the application methods, and control efficiency of the dry filters for the twelve (12) month period. PM and PM10 emissions from surface coating shall be calculated using the following equation:~~

$$\text{material usage} * \text{solid content} * (1 - \text{transfer efficiency}) * (1 - \text{control efficiency})$$

~~A transfer efficiency of 75% shall be used for airless or HVLP coating application.~~

~~A minimum control efficiency of 94% or the control efficiency determined in the stack testing shall be used for the control efficiency of the dry filters or wet scrubbers.~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.4.109~~ Particulate Matter (PM)

The dry filters and wet scrubbers for PM over spray control shall be in operation at all times when the thirteen (13) surface coating booths are in operation.

D.4.140 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.121 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.4.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- ~~(b) To document compliance with Condition D.4.1(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and PM10 emission limits established in Condition D.4.1(b).~~
- ~~(1) The amount and solid content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;~~
- ~~(2) A log of the dates of use;~~
- ~~(3) The total material usage for each month; and~~
- ~~(4) Calculated particulate matter emission for each month using the formula listed in Condition D.4.9;~~

- (eb) To document compliance with Condition D.4.1(b), the Permittee shall maintain records in accordance with (1) through ~~(5)~~(4) below. Records maintained for (1) through ~~(5)~~(4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1(b).
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (2) A log of the dates of use;
- ~~(3) The cleanup solvent usage for each month;~~
- ~~(4)~~(3) The total VOC usage for each month; and
- ~~(5)~~(4) The weight of VOCs emitted for each compliance period.
- (ec) To document compliance with Condition D.4.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (ed) To document compliance with Conditions D.4.409 and D.4.140, the Permittee shall maintain a log of weekly over spray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
- (fe) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.1 32 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.4.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days after the start up of the proposed units (EU27, EU28 and EU29). The initial compliance report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.4.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.
- (c) The semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
- (d) A quarterly summary of the information to document compliance with Condition ~~D.4.1(a)~~ and D.4.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) The reports required in (a), (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Section D.5

Conditions D.5.1, D.5.3 and D.5.4 have been removed, as follows:

D.5.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

~~The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.~~

~~Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.3 Record Keeping Requirements

~~To document compliance with Condition D.5.1, the Permittee shall maintain records of fuel usage and calculate emissions using AP-42 emission factors or other emission factors approved by IDEM, OAQ.~~

D.5.4 Reporting Requirements

~~A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Comment #6

Daily visible emission observations should not be required to be performed and documented for the boiler and the woodworking operations, when even without control devices these operations would not be out of compliance for PM.

Daily visible emission observations on the boiler would require that we have someone come in to work on Saturdays, Sundays, and Holidays for the purpose of doing these observations. The boiler is set to operate on its own and should not fluctuate wildly on its own during these times. If there is a problem like the boiler getting too hot, it will shut itself down and burn only on natural gas.

Response to Comment #6

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. Even though the cyclone may not be needed for the boiler to stay in compliance (when it is operating properly), visible emission observations are required. The woodworking operations do require the baghouses to stay in compliance. Therefore, the visible emission observations are required for the woodworking operations as well.

Comment #7

Quarterly baghouse inspections (D.2.7) should be a recommendation and not a permit requirement since the baghouses are not necessary to demonstrate compliance with PM emissions.

Response to Comment #7

As mentioned in Response #5, the sieve analysis provided by the Permittee is not sufficient to demonstrate that the baghouses are not necessary for the woodworking to stay in compliance with 326 IAC 6-3-2. OAQ has determined that the baghouses are necessary to demonstrate compliance with the PM emission limit in 326 IAC 6-3-2, therefore, quarterly baghouse inspections are required.

Comment #8

The PM emissions from the paint booths without the dry filters or any control device would not put us over the allowable emissions (D.4.11(a)) and therefore daily inspections and monitoring of the paint filters should not be required.

Response to Comment #8

Condition D.4.11(a) requires the paint booths to use dry filters as a control because OAQ believes that daily inspections are necessary to ensure compliance with 326 IAC 6-3-2(c) (Particulate Emission Limitations). IDEM receives numerous complaints about overspray from this type of facility. The use and monitoring of the filters is necessary to ensure that the facility is operating correctly and that the ambient air quality standards set forth in 326 IAC 1-3 will be attained and/or maintained and that the public health will be protected, as allowed by 326 IAC 2-1-5(a)(2). The monitoring of the performance of the dry filters is on a weekly basis in Condition D.4.11(a), not daily. No change has been made to the permit as a result of this comment.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

1. Condition C.1 has been removed, because the source shall limit PTE VOC and PM to less than 250 tons per year each and becomes a PSD minor source.

~~C.1 Major Source [325 IAC 2-2]~~

~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.~~

The numbering of conditions in Section has also been revised accordingly.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification, to a Part 70 Operating Permit

Source Background and Description

Source Name:	HomeCrest Corporation
Source Location:	1002 Eisenhower Drive North, Goshen, IN 46527
County:	Elkhart
SIC Code:	2434
Operation Permit No.:	T039-6029-00014
Operation Permit Issuance Date:	December 22, 1998
Permit Modification No.:	SPM 039-14143-00014
Permit Reviewer:	Linda Quigley/EVP

The Office of Air Quality (OAQ) has reviewed a significant permit modification application from HomeCrest Corporation relating to the operation of three (3) spray booths, woodworking operations and one (1) boiler in its wood furniture manufacturing process and re-designation as a PSD minor source.

History

On February 23, 2001, HomeCrest Corporation submitted an application to the OAQ requesting to add additional surface coating booths, woodworking operations, and a boiler to their existing plant. HomeCrest Corporation was issued a Part 70 permit on December 22, 1998. HomeCrest Corporation also requested a federally enforceable VOC, PM and PM10 emission limits of less than 250 tons per year and re-designation as a PSD minor source.

The modification consists of the construction of the following emission units and pollution control devices:

- (a) One (1) automated stain line, identified as EU27, with a maximum capacity of coating 2000 units per hour utilizing a high volume low pressure spray application, using dry filters for particulate matter control, and exhausting to stacks S41 and S42;
- (b) Two (2) automated varnish lines, identified as EU28 and EU29, each with a maximum capacity of coating 2000 units per hour utilizing an airless spray application, using wet scrubbers for particulate matter control, and exhausting to stacks S43 - S47 and S48 - S52, respectively; and
- (c) Millwork Woodworking equipment to replace existing woodworking operations, equipped with three (3) baghouses identified as EU15, EU16 and EU26 for particulate control, and exhausting to stacks S30, S31 and S40, respectively.

The source is also adding the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) natural gas fired boiler, identified as EU30, rated at 3.0 MMBtu per hour and exhausting through one (1) stack identified as S53.

Existing Approvals

The source was issued a Part 70 Operating Permit T039-6029-00014 on December 22, 1998.

The source was also issued Minor Source Modification 039-13961-00014 on April 12, 2001.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S 30	EU15 baghouse	94	2 X 4.5	22,000	72
S 31	EU16 baghouse	54	2 X 4.5	22,000	72
S 40	EU26 baghouse	49	4 X 8.5	62,000	72
S 41	EU27 spray booth	30	2.25	5888	72
S 42	EU27	32	0.78	1178	140
S 43	EU28 spray booth	30	2.00	7063	72
S 44	EU28	32	1.00	2354	72
S 45	EU28	32	1.00	2354	91
S 46	EU28	32	1.00	2354	110
S 47	EU28	32	1.00	3944	72
S 48	EU29 spray booth	30	2.00	7063	72
S 49	EU29	32	1.00	2354	72
S 50	EU29	32	1.00	2354	91
S 51	EU29	32	1.00	2354	110
S 52	EU29	32	1.00	3944	72
S 53	EU30 boiler	n/a	n/a	n/a	n/a

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 23, 2001. Additional information was received on April 5, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 through 6.

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

HAP's	Potential To Emit (tons/year)
Manganese Compounds	greater than 10
Xylene	greater than 10
Acetaldehyde	less than 10
Styrene	greater than 10
Acrolein	less than 10
MIK	greater than 10
Toluene	greater than 10
Formaldehyde	less than 10
Ethyl Benzene	greater than 10
TOTAL	greater than 25

Justification for Modification

This Significant Permit Modification will incorporate the minor source modification (039-13961-00014) and the PSD minor limit into the Part 70 permit and give the source approval to operate the new emission units.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NOx	Single HAP	Total HAPs
Woodworking	117.47	117.47	0.00	0.00	0.00	0.00	0.00	0.00
Spray Booths (new and existing)	(1)	(1)	0.00	(1)	0.00	0.00	(2)	(2)
Wood fired or natural gas boiler (existing)	59.56	59.56	0.00	0.00	0.00	0.00	0.00	0.00
Sub-Total	< 238	< 238	< 248	< 248	< 243	< 246	(2)	(2)
Boiler (new) ⁽³⁾	7.88	7.88	0.01	0.07	1.10	1.31	negl.	negl.
Incinerator ⁽³⁾ (existing)	3.81	3.83	1.4	1.63	5.85	2.02	negl.	negl.
Total Emissions	(1)	(1)	1.41	(1)	6.95	3.33	(2)	(2)
Total Source (new and existing)	< 250	< 250	< 250	< 250	< 250	< 250	(2)	(2)

⁽¹⁾ Source-wide emissions of VOC, PM and PM10 will be limited to less than 250 tons per year.

⁽²⁾ HAP emissions will be limited by the requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 63, Subpart JJ.

⁽³⁾ PM and PM10 limited potential to emit for the small boiler are based on the calculated 326 IAC 6-3-2 emission rate. The incinerator is based on unrestricted potential to emit.

Federal Rule Applicability

- (a) The one (1) natural gas fired boiler, identified as EU30, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because it has a maximum heat input rate of less than 10 MMBtu/hr.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 63, Subpart JJ.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions upon startup:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

- (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
- (A) Operator training course.
 - (B) Leak inspection and maintenance plan.
 - (C) Cleaning and washoff solvent accounting system.
 - (D) Chemical composition of cleaning and washoff solvents.
 - (E) Spray booth cleaning.
 - (F) Storage requirements.
 - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (H) Line cleaning.
 - (I) Gun cleaning.
 - (J) Washoff operations.
 - (K) Formulation assessment plan for finishing operations.
- (5) Records shall be maintained in accordance with (A) through (E) below. Records maintained for (A) through (E) shall be complete and sufficient to establish compliance with the VHAP usage limits.
- (A) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (B) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

- (C) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (D) The VHAP content in weight percent of each thinner used.
 - (E) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (6) An Initial Compliance Report shall be submitted within sixty (60) days following start up. The Initial Compliance Report must include data from the entire month that the compliance date falls.
 - (7) A semi-annual Continuous Compliance Report shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (A) January 1 through June 30.
- (B) July 1 through December 31.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is still subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD), this proposed modification is not considered a major modification because it has the potential to emit less than applicable PSD significant emission levels for any regulated pollutant. HomeCrest Corporation requests that the equipment listed in this permit modification and the existing equipment be included into a minor PSD limit. Therefore, the entire source (i.e., emission units previously permitted under T039-6029-00014 and emission units for this permit modification) will be limited to less than 250 tons of VOC, PM and PM10 emissions per twelve (12) consecutive month period. Therefore, the PSD rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source is subject to the National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63, Subpart JJ. Compliance with 40 CFR Part 63, Subpart JJ will satisfy the requirements of 326 IAC 2-4.1.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the woodworking operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (16.50)^{0.67} = 26.82$$

Based on the above equation, particulate matter emissions from the woodworking operations shall be limited to 26.82 lb/hr.

The three (3) baghouses shall be in operation at all times the woodworking facility is in operation, in order to comply with this limit.

- (b) The particulate matter (PM) from the spray booths (EU27, EU28, and EU29) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler (EU 30), with a heat input capacity rating of 3.0 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. operation capacity rating = 3.0 MMBtu/hr

For Q less than ten (10) MMBtu/hr, Pt shall not exceed 0.6.

Therefore, the maximum allowable particulate matter (PM) is 0.6 lb/MMBtu which is equivalent to a PM emission rate of 1.8 lb/hr for boiler ID No. EU 30. Potential PM emissions from the boiler are 0.02 tons per year, therefore this facility is in compliance with 326 IAC 6-2-4.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the surface coating operation because the operation is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall

utilize one of the following methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. The application methods in the spray booths EU27, EU28 and EU29 all comply with 326 IAC 8-2-12.

Testing Requirements

PM and PM10 emissions from surface coating are calculated as follows:

material usage * solid content * (1-transfer efficiency) * (1-control efficiency)

However, the facilities may not comply with the PSD limit for PM and PM10 of less than 250 tons per year. Therefore, stack tests will be required.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-3-2(c) (Process Operations).

2. The woodworking operations have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the all woodworking baghouse stacks shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Proposed Changes

A. SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a wood furniture manufacturing plant.

Responsible Official: Doug Conley
Source Address: 1002 Eisenhower Drive North, Goshen, IN 46526
Mailing Address: P.O. Box 595, Goshen, IN 46527
SIC Code: 2434
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
~~Major~~ **Minor** Source, under PSD Rules
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas or wood fired boiler EU 1, with a maximum rating of 17 MMBtu (million British thermal units) per hour. Emissions shall be controlled by a cyclone, then exhausted at Stack ID #S1;
- (b) ~~Woodworking operations EU 15 - EU 24, with a maximum rating of 33,000 pounds per hour. Emissions shall be controlled by baghouses, then exhausted at Stacks ID #S30-S39.~~ **Millwork Woodworking equipment equipped with three (3) baghouses identified as EU15, EU16 and EU26 for particulate control, and exhausting to stacks S30, S31 and S40, respectively;**
- (c) One (1) solid waste natural gas fired incinerator EU 2, with a maximum rating of 250 pounds per hour. Emissions shall be exhausted at Stack ID #S2;
- (d) ~~Ten (10)~~ **Thirteen (13)** Spray booths EU 3 - EU 12, **EU 27, EU 28 and EU 29**, consisting of the following:
 - (1) One (1) custom research and development paint booth EU 3, with a maximum rating of 3 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stack ID #S3;
 - (2) One (1) hanging line toner booth EU 4, with a maximum rating of 600 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S4 - S7;
 - (3) One (1) hanging line sealer booth EU 5, with a maximum rating of 600 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S8 - S9;

- (4) One (1) hanging line topcoat booth EU 6, with a maximum rating of 600 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S10 - S11;
- (5) One (1) flat line toner booth EU 7, with a maximum rating of 960 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S12 - S15;
- (6) One (1) flat line sealer booth EU 8, with a maximum rating of 960 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S16 - S17;
- (7) One (1) flat line topcoat booth EU 9, with a maximum rating of 960 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S18 - S20;
- (8) One (1) flat line repair booth EU 10, with a maximum rating of 180 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stack ID #S21;
- (9) One (1) parts booth EU 11, with a maximum rating of 180 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stacks ID #S22-S24;
- (10) One (1) hanging line repair booth EU 12, with a maximum rating of 180 units per hour. Emissions shall be controlled by dry filters, then exhausted at Stack ID #S25;
- (11) **One (1) automated stain line, identified as EU 27 with a maximum capacity of coating 2000 units per hour utilizing a high volume low pressure spray application, using dry filters for particulate matter control, and exhausting to stacks S 41 and S 42;**
- (12) **Two (2) automated varnish lines, identified as EU 28 and EU 29, each with a maximum capacity of coating 2000 units per hour utilizing an airless spray application, using wet scrubbers for particulate matter control, and exhausting to stacks S 43 - S 47 and S 48 - S 52, respectively.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) **Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:**
 - (1) **one (1) natural gas fired boiler, identified as EU30, rated at 3.0 MMBtu per hour and exhausting through one (1) stack identified as S53.**
- ~~(a)~~ (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.

- (b) (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; woodworking operations and Dust collection Emission Unit number 25.

D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) one natural gas or wood fired boiler EU 1, with a maximum rating of 17 MMBtu per hour. Emissions shall be controlled by cyclone, then exhausted at Stack/Vent ID #S1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.

Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D.1.1~~ D.1.2 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the 17 MMBtu per hour natural gas or wood fired boiler shall be limited to 0.8 pounds per MMBtu.

~~D.1.2~~ D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

~~D.1.3~~ D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM10 limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.1.4~~ D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the 17 MMBtu per hour boiler cyclone stack exhaust shall be performed during normal daylight operations when wood is combusted in the boiler. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.1.5~~ D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition ~~D.1.4~~ **D.1.5**, the Permittee shall maintain records of daily visible emission notations of the 17 MMBtu per hour boiler cyclone stack exhaust whenever wood is burned.
- (b) To document compliance with Condition **D.1.1**, the Permittee shall maintain records of fuel usage and calculate emissions using AP 42 emission factors or other emission factors approved by IDEM, OAQ.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition **D.1.1** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Section D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

~~Woodworking operations EU 15 – EU 24, with a maximum rating of 33,000 pounds per hour.~~

~~Emissions shall be controlled by baghouses, then exhausted at Stacks ID# S30-S39.~~

Millwork Woodworking equipment equipped with three (3) baghouses identified as EU15, EU16 and EU26 for particulate control, and exhausting to stacks S30, S31 and S40, respectively.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.

Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D-2-1~~ **D.2.2** Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 26.8 pounds per hour when operating at a process weight rate of 33,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

~~D-2-2~~ **D.2.3** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

~~D-2-3~~ **D.2.4** Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM₁₀ limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

~~D-2-4~~ **D.2.5** Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the woodworking machinery is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D-2-5~~ **D.2.6** Visible Emissions Notations

- (a) ~~Daily visible emission notations of the woodworking baghouse stacks exhaust shall be performed during normal daylight operations when vented to the outside atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

~~D.2.6~~ D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

~~D.2.7~~ D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.2.8~~ D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.2.4~~ and D.2.5 and **D.2.6**, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stacks exhaust.
- (b) To document compliance with Condition ~~D.2.6~~ **D.2.7**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.2.6~~ **D.2.7** and the dates the vents are redirected.
- (c) **To document compliance with Condition D.2.1, the Permittee shall maintain records of PM and PM10 emissions.**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) solid waste natural gas fired incinerator EU 2, with a maximum rating of 250 pounds per hour and exhausted at Stack/Vent ID #S2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.
- (b) The entire source shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limitation includes equipment listed in sections D.3 and D.4.
- (c) Compliance with limits in D.3.1(a) and D.3.1(b) shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D.3.1~~ D.3.2 Solid Waste Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), this solid waste natural gas incinerator, rated at 250 pounds per hour shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity limitations).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazardous.
- (i) Not emit particulate matter (PM) in excess of 0.3 pounds per 1000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

~~D.3.2~~ D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

~~D.3.3~~ **D.3.4** Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM **and PM10** limits specified in Conditions D.3.1 **and D.3.2** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.3.4~~ **D.3.5** Visible Emissions Notations

- (a) Daily visible emission notations of the incinerator stack exhaust shall be performed during normal daylight operations whenever the incinerator is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.3.5~~ **D.3.6** Record Keeping Requirements

- (a) To document compliance with Condition ~~D.3.4~~ **D.3.5**, the Permittee shall maintain records of daily visible emission notations of the incinerator stack exhaust.
- (b) To document compliance with Condition D.3.1(a) and D.3.1(b), the Permittee shall maintain records of PM, PM10 and VOC emissions.

D.3.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1(a) and D.3.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

~~Ten (10)~~ **Thirteen (13)** surface coating booths, identified as units EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, EU 11, EU 12, **EU27, EU28 and EU29**, with dry filters for control. Unit EU-3 exhausts to Stack ID# S3; Unit EU 4 exhausts to Stacks ID# S4 - S7; Unit EU 5 exhausts to Stacks ID# S8 and S9; Unit EU 6 exhausts to Stacks ID# S10 and S11; Unit EU 7 exhausts to Stacks ID# S12 - S15; Unit EU 8 exhausts to Stacks ID# S16 and S17; Unit EU 9 exhausts to Stacks ID# S18-S20; Unit EU 10 exhausts to Stack ID# 21; Unit EU 11 exhausts to Stacks ID# S22 - S24; Unit EU 12 exhausts to Stack ID# S25; **Unit EU 27 exhausts to Stacks ID# S41 - S42; Unit EU 28 exhausts to Stacks ID# S43 - S47; Unit EU 29 exhausts to Stacks ID# S48 - S52.**

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.
- (b) The entire source shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limitation includes equipment listed in sections D.3 and D.4.
- (c) Compliance with limits in D.4.1(a) and D.4.1(b) shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D.4.1~~ D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM from each of the ~~ten (10)~~ **thirteen (13)** surface coating booths (EU 3 through EU 12, **EU 27, EU 28 and EU 29**) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

~~D.4.2~~ Volatile Organic Compound (VOC)

~~Any change or modification which may increase potential emissions from the surface coating operations shall require prior approval from the OAQ to determine applicability requirements of 326 IAC 8, before such change may occur.~~

D 4 3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D 4 4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average VHAP content across all coatings of 1.0 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.

- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.
- (C) Use a control device to limit emissions.
- (3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.4.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line Cleaning.
- (i) Gun Cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.4.7 Testing Requirements [326 IAC 2-7-6(1), (6)] [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, subpart JJ and 326 IAC 3-6.
- (b) ~~IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Conditions D.4.1 and D.4.4 shall be determined by a performance test conducted in accordance with Section C-Performance Testing.~~

- (b) During the period between 18 and 24 months after issuance of this permit, in order to verify the dry filters and wet scrubbers control efficiencies, the Permittee shall perform PM and PM-10 testing on dry filters for one (1) of the eleven (11) surface coating booths controlled by dry filters for one (1) of the two (2) surface coating booths controlled by wet scrubber utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

D 4 8 Volatile Organic Compounds (VOC)

- (a) Compliance with VOC content limitations contained in Condition D.4.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), using formulation data supplied by the coating manufacturer. The OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedure specified in 326 IAC 8-1-4.
- (b) Compliance with Condition D.4.1(b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D 4 9 Particulate Matter (PM)

Compliance with Condition D.4.1(a) shall be demonstrated within 30 days of the end of each month based on the material usage and solid content of the material, the transfer efficiency of the application methods, and control efficiency of the dry filters for the twelve (12) month period. PM and PM10 emissions from surface coating shall be calculated using the following equation:

$$\text{material usage} * \text{solid content} * (1 - \text{transfer efficiency}) * (1 - \text{control efficiency})$$

A transfer efficiency of 75% shall be used for airless or HVLP coating application.
A minimum control efficiency of 94% or the control efficiency determined in the stack testing shall be used for the control efficiency of the dry filters or wet scrubbers.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D 4 9~~ D 4 10 Particulate Matter (PM)

The dry filters **and wet scrubbers** for PM over spray control shall be in operation at all times when the ~~ten (10)~~ **thirteen (13)** surface coating booths are in operation.

~~D 4 10~~ D 4 11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.4.11~~ D.4.12 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.4.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) **To document compliance with Condition D.4.1(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and PM10 emission limits established in Condition D.4.1(b).**
 - (1) **The amount and solid content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;**
 - (2) **A log of the dates of use;**
 - (3) **The total material usage for each month; and**
 - (4) **Calculated particulate matter emission for each month using the formula listed in Condition D.4.9.**

- (c) To document compliance with Condition D.4.1(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1(b).
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.4.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) To document compliance with Conditions ~~D.4.9~~ D.4.10 and **D.4.11**, the Permittee shall maintain a log of weekly over spray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.4.12~~ **D.4.13** Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.4.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days ~~following the compliance date of November 21, 1997.~~ **after the start up of the proposed units (EU27, EU28 and EU29).** The initial compliance report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.4.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

~~For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:~~

- ~~(1) November 21, 1997 through May 20, 1998.~~
- ~~(2) May 21 through November 30, 1998.~~
- ~~(3) December 1 through December 31, 1998.~~

- (c) ~~Following the first year of reporting,~~ The semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
- (d) **A quarterly summary of the information to document compliance with Condition D.4.1(a) and D.4.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- ~~(d)~~ (e) The reports required in (a), (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.5

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Insignificant Activity

One (1) natural gas-fired boiler, identified as EU30, with a heat input capacity of 3.0 million Btu per hour (MMBtu), and exhausting to stack S53.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.5.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall be limited to less than 250 tons of PM and PM10 emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1 through D.5.

Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.5.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from one (1) natural gas-fired boiler (ID No. EU30), shall not exceed 0.6 pounds per million Btu heat input.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.3 Record Keeping Requirements

To document compliance with Condition D.5.1, the Permittee shall maintain records of fuel usage and calculate emissions using AP 42 emission factors or other emission factors approved by IDEM, OAQ.

D.5.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Conclusion

The operation of this wood furniture manufacturing process shall be subject to the conditions of the attached proposed **Significant Permit Modification No. 039-14143-00014**.

Appendix A: Emission Calculations

Company Name: HomeCrest Corporation
Address City IN Zip: 1002 Eisenhower Drive North, Goshen, Indiana 46526
SPM: 039-14143-00014
Plt ID: 039-00014
Reviewer: Linda Quigley/EVP
Date: March 12, 2001

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Natural Gas Combustion	TOTAL
PM	2,930.08	2,781.17	0.02	5,711.27
PM10	2,930.08	2,781.17	0.10	5,711.35
SO2	0.00	0.00	0.01	0.01
NOx	0.00	0.00	1.31	1.31
VOC	10,137.97	0.00	0.07	10,138.04
CO	0.00	0.00	1.10	1.10
total HAPs	3,428.37	0.00	negl.	3,428.37
worst case single HAP	1,980.24	0.00	negl.	1,980.24
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Natural Gas Combustion	TOTAL
PM	< 250	2.78	0.02	< 250
PM10	< 250	2.78	0.10	< 250
SO2	0.00	0.00	0.01	0.01
NOx	0.00	0.00	1.31	1.31
VOC	< 250	0.00	0.07	< 250
CO	0.00	0.00	1.10	1.10
total HAPs	3,428.37	0.00	negl.	3,428.37
worst case single HAP	1,980.24	0.00	negl.	1,980.24
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Page 2 of 6 TSD App A

Company Name: HomeCrest Corporation
Address City IN Zip: 1002 Eisenhower Drive North, Goshen, Indiana 46526
SPM: 039-14143-00014
Pit ID: 039-00014
Reviewer: Linda Quigley/EVP
Date: March 12, 2001

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
L025013	7.86	54.52%	0.00%	54.52%	0.00%	32.94%	0.05400	2000.000	4.29	4.29	462.81	11107.43	2027.11	422.75	13.01	75%
972-50C27-0150	7.58	54.59%	0.00%	54.59%	0.00%	27.99%	0.05400	2000.000	4.14	4.14	446.90	10725.49	1957.40	407.06	14.78	75%
1735C40313	7.80	65.94%	0.00%	65.94%	0.00%	26.51%	0.05400	2000.000	5.14	5.14	555.48	13331.49	2433.00	314.18	19.40	75%
1735C40307	7.71	68.11%	0.00%	68.11%	0.00%	24.72%	0.05400	2000.000	5.25	5.25	567.14	13611.32	2484.07	290.77	21.24	75%
Stains																
L019131	8.43	94.83%	92.80%	2.03%	0.00%	5.17%	0.05400	2000.000	0.17	0.17	18.48	443.57	80.95	51.54	3.31	75%
1311D00382	7.26	98.40%	0.00%	98.40%	0.00%	1.18%	0.05400	2000.000	7.14	7.14	771.53	18516.83	3379.32	13.74	605.41	75%
1310W00101	7.42	77.34%	0.00%	77.34%	0.00%	9.01%	0.05400	2000.000	5.74	5.74	619.77	14874.52	2714.60	198.84	63.69	75%
1310R00072	7.43	74.85%	0.00%	74.85%	0.00%	15.55%	0.05400	2000.000	5.56	5.56	600.63	14415.03	2630.74	220.99	35.76	75%
1331D01852	7.05	98.05%	0.00%	98.05%	0.00%	0.73%	0.05400	2000.000	6.91	6.91	746.55	17917.26	3269.90	16.26	946.92	75%
1310D03274	8.03	70.15%	0.00%	70.15%	0.00%	29.85%	0.05400	2000.000	5.63	5.63	608.37	14600.85	2664.66	283.46	18.87	75%
1310D04308	7.12	88.78%	0.54%	88.24%	0.46%	5.78%	0.05400	2000.000	6.31	6.28	678.53	16284.73	2971.96	94.47	108.70	75%
1704W00052	9.81	57.78%	0.00%	57.78%	0.00%	42.22%	0.05400	2000.000	5.67	5.67	612.17	14692.02	2681.29	489.81	13.43	75%
1310D03274	7.98	69.96%	0.00%	69.96%	0.00%	30.04%	0.05400	2000.000	5.58	5.58	602.94	14470.64	2640.89	283.49	18.58	75%
1310D01004	9.16	57.74%	0.00%	57.74%	0.00%	42.26%	0.05400	2000.000	5.29	5.29	571.21	13709.05	2501.90	457.79	12.52	75%
1116R00371	6.80	98.89%	0.20%	98.69%	0.20%	0.67%	0.05400	2000.000	6.72	6.71	724.78	17394.70	3174.53	8.93	1001.63	75%
1310D02376	6.64	93.45%	0.00%	93.45%	0.00%	6.55%	0.05400	2000.000	6.21	6.21	670.15	16083.57	2935.25	51.43	94.73	75%
1310D00937	6.72	94.19%	0.00%	94.19%	0.00%	3.20%	0.05400	2000.000	6.33	6.33	683.59	16406.24	2994.14	46.17	197.80	75%

State Potential Emissions

Note: State Potential Emissions = Worst case coating varnish (in bold) multiplied by 2 (for two varnish booths) plus worst case coating stain (in bold) (for one stain booth). Each coating is mutually exclusive.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Control Efficiency:		1905.81	45739.47	8347.45	1335.30
VOC	PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
0.00%	94.00%	**	**	**	80.12

**** Source will limit source wide VOC emissions to less than 250 tons per year.**

Appendix A: Emission Calculations
HAP Emission Calculations

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Company Name: HomeCrest Corporation
Address City IN Zip: 1002 Eisenhower Drive North, Goshen, Indiana 46526
SPM: 039-14143-00014
Pit ID: 039-00014
Permit Reviewer: Linda Quigley/EVP
Date: March 12, 2001

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Manganese Compounds Emissions	Xylene Emissions	Acetaldehyde Emissions	Styrene Emissions	Acrolein Emissions	Methyl Isobutyl Ketone Emissions	Toluene Emissions	Formaldehyde Emissions	Ethyl Benzene Emissions
	(Lb/Gal)	(gal/unit)	(unit/hour)	Manganese Compounds	Xylene	Acetaldehyde	Styrene	Acrolein	Methyl Isobutyl Ketone	Toluene	Formaldehyde	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
L025013	7.86	0.0540	2000.00	0.0000%	0.0400%	0.0637%	1.2988%	0.0637%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	1.49	2.37	48.29	2.37	0.00	0.00	0.00	0.00
972-50C27-0150	7.58	0.0540	2000.00	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	1.0000%	0.0000%	0.0000%	0.0000%	0.00	0.00	0.00	0.00	0.00	35.86	0.00	0.00	0.00
1735C40313	7.80	0.0540	2000.00	0.0000%	8.0000%	0.0000%	0.0000%	0.0000%	0.0000%	13.0000%	0.0000%	1.5000%	0.00	295.18	0.00	0.00	0.00	0.00	479.66	0.00	55.35
1735C40307	7.71	0.0540	2000.00	0.0000%	8.0000%	0.0000%	0.0000%	0.0000%	0.0000%	13.0000%	0.0000%	0.0000%	0.00	291.77	0.00	0.00	0.00	0.00	474.13	0.00	0.00
Stains																					
L019131	8.43	0.0540	2000.00	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1311D00382	7.26	0.0540	2000.00	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	1.5000%	0.0000%	0.0000%	0.00	0.00	0.00	0.00	0.00	0.00	51.51	0.00	0.00
1310W00101	7.42	0.0540	2000.00	0.0000%	8.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	1.0000%	0.00	280.80	0.00	0.00	0.00	0.00	0.00	0.00	35.10
1310R00072	7.43	0.0540	2000.00	0.0000%	8.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	4.0000%	0.00	281.17	0.00	0.00	0.00	0.00	0.00	0.00	140.59
1331D01852	7.05	0.0540	2000.00	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	1.0000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	33.35
1310D03274	8.03	0.0540	2000.00	0.0000%	4.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	151.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1310D04308	7.12	0.0540	2000.00	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1704W00052	9.81	0.0540	2000.00	0.0000%	6.0000%	0.0000%	0.0000%	0.0000%	9.0000%	22.0000%	0.0990%	1.0000%	0.00	278.43	0.00	0.00	0.00	417.65	1020.91	4.59	46.41
1310D03274	7.98	0.0540	2000.00	0.0000%	4.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	150.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1310D01004	9.16	0.0540	2000.00	2.0000%	17.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	4.0000%	86.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00	173.32
1116R00371	6.80	0.0540	2000.00	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1310D02376	6.64	0.0540	2000.00	0.0000%	3.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	94.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1310D00937	6.72	0.0540	2000.00	0.0000%	2.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.00	63.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00

State Potential Emissions 0.00 868.79 0.00 0.00 0.00 417.65 1980.24 4.59 157.10

Note: State Potential Emissions = worst case coating varnish (in bold) multiplied by 2 (for two varnish booths) plus worst case coating stain (in bold) (for one stain booth).
Each coating is mutually exclusive.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
NESHAP 40 CFR 63, Subpart JJ - The source has demonstrated compliance with Subpart JJ by submitting Certified Product Data Sheet Reports for each coating used.
Each stain, sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied.

Appendix A: Process Particulate Emissions

Company Name: HomeCrest Corporation
Address City IN Zip: 1002 Eisenhower Drive North, Goshen, Indiana 46526
SPM: 039-14143-00014
Pit ID: 039-00014
Reviewer: Linda Quigley/EVP
Date: March 12, 2001

State Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
EU15 and EU16	2	0.01000	0.8	1,618	99.90%	971.91
EU26	1	0.01000	0.8	6,024	99.90%	1809.27
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						2781.17
Federal Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
EU15 and EU16	2	0.01000	0.8	1,618	99.90%	0.97
EU26	1	0.01000	0.8	6,024	99.90%	1.81
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						2.78

Methodology:State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

**Appendix A: Emission Calculations
Incinerator**

Page 4a of 6 TSD App A

Company Name: HomeCrest Corporation
Address City IN Zip: 1002 Eisenhower Drive North, Goshen, Indiana 46526
SPM: 039-14143-00014
Plt ID: 039-00014
Reviewer: Linda Quigley/EVP
Date: June 19, 2001

THROUGHPUT
lbs/hr
250

THROUGHPUT
ton/yr
1095

Emission Factor in lb/ton	POLLUTANT				
	PM	SO2	CO	VOC	NOX
	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	3.8	1.4	5.5	1.6	1.6

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Page 5 of 6 TSD App A
revised

Small Industrial Boiler and Incinerator

Company Name: HomeCrest Corporation
Address City IN Zip: 1002 Eisenhower Drive North, Goshen, Indiana 46526
SPM: 039-14143-00014
Pit ID: 039-00014
Reviewer: Linda Quigley/EVP
Date: June 19, 2001

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.0	small boiler
1.0	incinerator

26.28
8.32

34.60

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.03	0.13	0.01	**see below	0.10	1.45

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations

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Natural Gas Combustion Only

revised

MM BTU/HR <100**Small Industrial Boiler****HAPs Emissions****Company Name:** HomeCrest Corporation**Address City IN Zip:** 1002 Eisenhower Drive North, Goshen, Indiana 46526**SPM:** 039-14143-00014**Pit ID:** 039-00014**Reviewer:** Linda Quigley/EVP**Date:** March 12, 2001**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.633E-05	2.076E-05	1.298E-03	3.114E-02	5.882E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.651E-06	1.903E-05	2.422E-05	6.574E-06	3.633E-05

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.